

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

PUBLIC INTEREST LEGAL  
FOUNDATION, INC.,

Plaintiff,

Case No. 24-CV-1561 (SRN/DJF)

v.

STEVE SIMON, in his official capacity as  
the Secretary of State for the State of  
Minnesota,

**UNITED STATES’  
NOTICE OF INTERVENTION  
PURSUANT TO 28 U.S.C. § 2403(a)**

Defendant.

Pursuant to 28 U.S.C. § 2403(a) and Federal Rule of Civil Procedure 5.1(c), and in response to Plaintiffs’ Notice of Constitutional Question, ECF No. 18, the United States hereby respectfully notifies the Court that it exercises its right to intervene in this proceeding to defend the constitutionality of Section 4(b) of the National Voter Registration Act of 1993, 52 U.S.C. § 20503(b). Unless otherwise directed by the Court, the United States expects to submit a brief regarding the constitutionality of Section 4(b) on or before September 17, 2024.

Date: August 27, 2024

ANDREW M. LUGER  
United States Attorney  
District of Minnesota

KRISTEN CLARKE  
Assistant Attorney General

SPARKLE SOOKNANAN  
Principal Deputy Assistant Attorney  
General  
Civil Rights Division

/s/ Bahram Samie  
BAHRAM SAMIE  
#0392645  
Assistant U.S. Attorney  
Office of the United States Attorney

/s/ Brian Remlinger  
R. TAMAR HAGLER  
RICHARD DELLHEIM\*  
New York Bar #2564177  
DANIEL J. FREEMAN\*  
New York Bar #4582037  
BRIAN REMLINGER\*\*  
District of Columbia Bar #1765728  
Attorneys, Voting Section  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Ave. NW  
Washington, D.C. 20530  
Phone: (800) 253-3931  
Fax: (202) 307-3961  
brian.remlinger@usdoj.gov

*\*Motion for admission pro hac vice  
forthcoming*

*\*\*Motion for admission pro hac vice  
docketed*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

PUBLIC INTEREST LEGAL  
FOUNDATION, INC.,

Plaintiff,

Case No. 24-CV-1561 (SRN/DJF)

v.

**CERTIFICATE OF SERVICE**

STEVE SIMON, in his official capacity as the  
Secretary of State for the State of Minnesota,

Defendant.

I hereby certify that on August 27, 2024, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Brian Remlinger  
Brian Remlinger  
District of Columbia Bar #1765728  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Ave, NW  
Washington, DC 20530  
(202) 717-4154  
brian.remlinger@usdoj.gov